

February 28, 2023

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Rusis et al. v. International Business Machines Corp., Civil Action No. 1:18-cv-08434-VEC-SLC

Dear Judge Caproni:

The parties submit this joint status letter pursuant to Your Honor's January 24, 2023 Order (Dkt. No. 288) granting the parties' request to continue the stay of the proceeding and setting a deadline of February 28, 2023 to file either a stipulation of dismissal or a status report. As the parties indicated in their January 23, 2023 status report and joint request for stay (Dkt. No. 287), the parties reached a tentative resolution of this matter and at that time, Plaintiffs' counsel needed to conclude discussions with a small number of the 90 remaining plaintiffs regarding the tentative resolution. Plaintiffs' counsel recently concluded discussions with all plaintiffs but the parties need a short additional extension of the stay to finalize the settlement paperwork and file the stipulation of dismissal with the Court.

As such, the parties respectfully request Your Honor to continue the full stay of the above captioned proceeding through and including March 21, 2023. The parties agree to file stipulations of dismissal or an updated status report by March 21, 2023.

If this joint request for a stay meets with Your Honor's approval, a "So Ordered" line is provided below for the Court's convenience.

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Respectfully submitted,


/s/ Shannon Liss-Riordan
Shannon Liss-Riordan
Counsel for Plaintiffs

/s/ Matthew W. Lampe
Matthew W. Lampe
Counsel for Defendant

cc: All counsel of record (via ECF)

IT IS SO ORDERED.

DATED: 03/01/2023



Hon. Valerie E. Caproni
United States District Judge